

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO.,  
GEICO INDEMNITY CO., GEICO GENERAL  
INSURANCE COMPANY and GEICO CASUALTY CO.,

Docket No.: 1:15-cv-3135-ARR-SMG

Plaintiffs,

- against -

ARKADY KINER, L.AC., ARNICA ACUPUNCTURE, PC,  
STEVEN WOLFSON, L.AC., GLOBAL ACUPUNCTURE,  
PC., ALEXANDRA SHERESHEVSKAYA, MD, MODERN  
PSYCHIATRIC SERVICES, PC., TAMER A. GAD, P.T.,  
UNIVERSAL REHAB PT, P.C., CHESTER JAY REGANIT  
TOLENTINO, P.T., SPEEDY WAY PT., P.C., YOMAYRA  
RODRIGUEZ THERAPEUTIC SOLUTIONS MASSAGE  
THERAPY, P.C.,

- and -

RAFAEL DJAFAROV and  
JOHN DOE DEFENDANTS 1-10,

Defendants.

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**DEFENDANT RAFAEL DJAFAROV'S ANSWER TO  
COMPLAINT**

Defendant RAFAEL DJAFAROV files the following Answer to Plaintiffs' Complaint as follows:

**I.  
ANSWER**

1. In answer to the allegations in paragraph 1 of the Complaint, DJAFAROV denies that he had any control over the defendant clinics and/or doctors or that he financially benefitted from any alleged fraudulent no-fault insurance claims. Defendant DJAFAROV was an

employee, without any management or billing responsibilities, of defendant, UNIVERSAL REHAB PT, P.C.

2. In answer to the allegations in paragraph 2 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

3. In answer to the allegations in paragraph 3 of the Complaint, DJAFAROV denies that he illegally owned and controlled the Provider Defendants and the clinic from which the Provider Defendants operated, paid kickbacks for patient referrals, and caused Insureds to be referred amongst the Provider Defendants.

4. In answer to the allegations in paragraph 4 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

5. In answer to the allegations in paragraph 5 of the Complaint, DJAFAROV denies being compensated for the services that have been billed to GEICO through Provider Defendants.

6. In answer to the allegations in paragraph 6 of the Complaint, DJAFAROV denies having any legal connection to the alleged fraudulently submitted claims.

7. In answer to the allegations in paragraph 7 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

8. In answer to the allegations in paragraph 8 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

9. In answer to the allegations in paragraph 9 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

10. In answer to the allegations in paragraph 10 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

11. In answer to the allegations in paragraph 11 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

12. In answer to the allegations in paragraph 12 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

13. In answer to the allegations in paragraph 13 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

14. In answer to the allegations in paragraph 14 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

15. In answer to the allegations in paragraph 15 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

16. In answer to the allegations in paragraph 16 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

17. In answer to the allegations in paragraph 17 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

18. In answer to the allegations in paragraph 18 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

19. In answer to the allegations in paragraph 19 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

20. In answer to the allegations in paragraph 20 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

21. In answer to the allegations in paragraph 21 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

22. In answer to the allegations in paragraph 22 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

23. In answer to the allegations in paragraph 23 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph..

24. In answer to the allegations in paragraph 24 of the Complaint, DJAFAROV denies that he managed and/or controlled any of the Provider Defendants or that he retained collection lawyers to file collection suits and arbitrations against GEICO.

25. In answer to the allegations in paragraph 25 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

26. In answer to the allegations in paragraph 26 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

27. In answer to the allegations in paragraph 27 of the Complaint, DJAFAROV admits to being a resident of the State of New York and to not being a licensed medical professional, but denies that he owned, controlled or derived economic benefit from the Provider Defendants and/or split fees with the Provider Defendants.

28. In answer to the allegations in paragraph 28 of the Complaint, DJAFAROV admits to the allegations contained in the paragraph.

29. In answer to the allegations in paragraph 29 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph concerning John Doe Defendants 1-10 and on that basis denies the allegations in such paragraph. DJAFAROV also denies that he owned, controlled and derived economic benefit from the Provider Defendants or split fees with the Provider Defendants.

30. In answer to the allegations in paragraph 30 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

31. In answer to the allegations in paragraph 31 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph. DJAFAROV denies that he was part of Management.

32. In answer to the allegations in paragraph 32 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

33. In answer to the allegations in paragraph 33 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

34. In answer to the allegations in paragraph 34 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

35. In answer to the allegations in paragraph 35 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

36. In answer to the allegations in paragraph 36 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

37. In answer to the allegations in paragraph 37 of the Complaint, DJAFAROV denies that this Court has jurisdiction over the action filed by Plaintiffs against him and that the amount in controversy in the action filed by Plaintiffs' against him exceeds the sum of \$75,000.00. DJAFAROV also denies that this Court has jurisdiction over the claims brought under 18 U.S.C. §§ 1961 et seq. (the Racketeer Influenced and Corrupt Organizations ("RICO") Act.

38. In answer to the allegations in paragraph 38 of the Complaint, DJAFAROV admits that Eastern District of New York is the correct District.

39. In answer to the allegations in paragraph 39 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

40. In answer to the allegations in paragraph 40 of the Complaint, DJAFAROV admits the allegations in the paragraph.

41. In answer to the allegations in paragraph 41 of the Complaint, DJAFAROV admits the allegations in the paragraph.

42. In answer to the allegations in paragraph 42 of the Complaint, DJAFAROV admits the allegations in the paragraph 42.

43. In answer to the allegations in paragraph 43 of the Complaint, DJAFAROV admits the allegations in the paragraph.

44. In answer to the allegations in paragraph 44 of the Complaint, DJAFAROV admits the allegations in the paragraph.

45. In answer to the allegations in paragraph 45 of the Complaint, DJAFAROV admits the allegations in the paragraph.

46. In answer to the allegations in paragraph 46 of the Complaint, DJAFAROV admits the allegations in the paragraph.

47. In answer to the allegations in paragraph 47 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

48. In answer to the allegations in paragraph 48 of the Complaint, DJAFAROV admits the allegations in the paragraph.

49. In answer to the allegations in paragraph 49 of the Complaint, DJAFAROV admits the allegations in the paragraph.

50. In answer to the allegations in paragraph 50 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

51. In answer to the allegations in paragraph 51 of the Complaint, DJAFAROV admits the allegations in the paragraph.

52. In answer to the allegations in paragraph 52 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual cases. DJAFAROV denies that he was indicted in connection with a systematic scheme to defraud New York automobile insurance companies of more than \$3.8 million dollars. DJAFAROV denies that the Government had any proof that he was responsible for the oversight of the Remsen Clinic, including management, finances and the daily operations of the clinic. DJAFAROV asserts that the GOVERNMENT was forced to admit on the record at sentencing that it had no proof that DJAFAROV had any control or management of the Defendant Providers.

53. In answer to the allegations in paragraph 53 of the Complaint, DJAFAROV admits the allegations in the paragraph.

54. In answer to the allegations in paragraph 54 of the Complaint, DJAFAROV denies that he masterminded, implemented, owner or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive.

55. In answer to the allegations in paragraph 55 of the Complaint, DJAFAROV denies that he masterminded, implemented, owner or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive.

56. In answer to the allegations in paragraph 56 of the Complaint, DJAFAROV denies that he controlled or owned any of the Provider Defendants.

58. In answer to the allegations in paragraph 58 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

59. In answer to the allegations in paragraph 59 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

60. In answer to the allegations in paragraph 60 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

61. In answer to the allegations in paragraph 61 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

62. In answer to the allegations in paragraph 62 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were

not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

63. In answer to the allegations in paragraph 63 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

64. In answer to the allegations in paragraph 64 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

65. In answer to the allegations in paragraph 65 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

66. In answer to the allegations in paragraph 66 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

67. In answer to the allegations in paragraph 67 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

68. In answer to the allegations in paragraph 68 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

69. In answer to the allegations in paragraph 69 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

70. In answer to the allegations in paragraph 70 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

71. In answer to the allegations in paragraph 71 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that

billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

72. In answer to the allegations in paragraph 72 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

73. In answer to the allegations in paragraph 73 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

74. In answer to the allegations in paragraph 74 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

75. In answer to the allegations in paragraph 75 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

76. In answer to the allegations in paragraph 76 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

77. In answer to the allegations in paragraph 77 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that

billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

78. In answer to the allegations in paragraph 78 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

79. In answer to the allegations in paragraph 79 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

80. In answer to the allegations in paragraph 80 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

81. In answer to the allegations in paragraph 81 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were

not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

82. In answer to the allegations in paragraph 82 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

83. In answer to the allegations in paragraph 83 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

84. In answer to the allegations in paragraph 84 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

85. In answer to the allegations in paragraph 85 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

86. In answer to the allegations in paragraph 86 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were

not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

87. In answer to the allegations in paragraph 87 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

88. In answer to the allegations in paragraph 88 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

89. In answer to the allegations in paragraph 89 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

90. In answer to the allegations in paragraph 90 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

91. In answer to the allegations in paragraph 91 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

92. In answer to the allegations in paragraph 92 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

93. In answer to the allegations in paragraph 93 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

94. In answer to the allegations in paragraph 94 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

95. In answer to the allegations in paragraph 95 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

96. In answer to the allegations in paragraph 96 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

97. In answer to the allegations in paragraph 97 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

98. In answer to the allegations in paragraph 98 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

99. In answer to the allegations in paragraph 99 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

100. In answer to the allegations in paragraph 100 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

101. In answer to the allegations in paragraph 101 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

102. In answer to the allegations in paragraph 102 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

103. In answer to the allegations in paragraph 103 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

104. In answer to the allegations in paragraph 104 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

105. In answer to the allegations in paragraph 105 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

106. In answer to the allegations in paragraph 106 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

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107. In answer to the allegations in paragraph 107 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

108. In answer to the allegations in paragraph 108 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

109. In answer to the allegations in paragraph 109 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

110. In answer to the allegations in paragraph 110 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

111. In answer to the allegations in paragraph 111 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

112. In answer to the allegations in paragraph 112 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

113. In answer to the allegations in paragraph 113 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

114. In answer to the allegations in paragraph 114 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

115. In answer to the allegations in paragraph 115 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

116. In answer to the allegations in paragraph 116 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

117. In answer to the allegations in paragraph 117 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

118. In answer to the allegations in paragraph 118 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

119. In answer to the allegations in paragraph 119 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

120. In answer to the allegations in paragraph 120 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

121. In answer to the allegations in paragraph 121 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

122. In answer to the allegations in paragraph 122 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

123. In answer to the allegations in paragraph 123 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

124. In answer to the allegations in paragraph 124 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

125. In answer to the allegations in paragraph 125 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

126. In answer to the allegations in paragraph 126 of the Complaint, DJAFAROV denies that he masterminded, implemented, owned or controlled a complex fraudulent scheme that billed GEICO and other New York insurers for No-Fault benefits the Defendant Providers were not entitled to receive or that he recruited any of the Provider Defendants to participate in the alleged scheme.

127. In answer to the allegations in paragraph 127 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

128. In answer to the allegations in paragraph 128 of the Complaint, DJAFAROV denies that he had any control or management powers over the Provider Defendants or that he entered into any agreements to lease, market, manage, bill and/or collect on behalf of the Provider Defendants. DJAFAROV was merely an employee of defendant UNIVERSAL REHAB PT, P.C.

129. In answer to the allegations in paragraph 129 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants or that he entered into any agreements to lease, market, manage, bill and/or collect on behalf of the Provider Defendants. DJAFAROV was merely an employee of defendant UNIVERSAL REHAB PT, P.C.

130. In answer to the allegations in paragraph 130 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants or that he entered into any agreements to lease, market, manage, bill and/or collect on behalf of the Provider Defendants. DJAFAROV admits that he was an employee of defendant UNIVERSAL REHAB PT, P.C.

131. In answer to the allegations in paragraph 131 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants or that he entered into any agreements to lease, market, manage, bill and/or collect on behalf of the

Provider Defendants. DJAFAROV admits that he was an employee of defendant UNIVERSAL REHAB PT, P.C.

132. In answer to the allegations in paragraph 132 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C.. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

133. In answer to the allegations in paragraph 133 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C.. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

134. In answer to the allegations in paragraph 134 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C.. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

135. In answer to the allegations in paragraph 135 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C.. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

136. In answer to the allegations in paragraph 136 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

137. In answer to the allegations in paragraph 137 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

138. In answer to the allegations in paragraph 138 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

139. In answer to the allegations in paragraph 139 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

140. In answer to the allegations in paragraph 140 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

141. In answer to the allegations in paragraph 141 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

142. In answer to the allegations in paragraph 142 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

143. In answer to the allegations in paragraph 143 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

144. In answer to the allegations in paragraph 144 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

145. In answer to the allegations in paragraph 145 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

146. In answer to the allegations in paragraph 146 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

147. In answer to the allegations in paragraph 147 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

148. In answer to the allegations in paragraph 148 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

149. In answer to the allegations in paragraph 149 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

150. In answer to the allegations in paragraph 150 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

151. In answer to the allegations in paragraph 151 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

152. In answer to the allegations in paragraph 152 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

153. In answer to the allegations in paragraph 153 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

154. In answer to the allegations in paragraph 154 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

155. In answer to the allegations in paragraph 155 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

156. In answer to the allegations in paragraph 156 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

157. In answer to the allegations in paragraph 157 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

158. In answer to the allegations in paragraph 158 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

159. In answer to the allegations in paragraph 159 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

160. In answer to the allegations in paragraph 160 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

161. In answer to the allegations in paragraph 161 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

162. In answer to the allegations in paragraph 162 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

163. In answer to the allegations in paragraph 163 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

164. In answer to the allegations in paragraph 164 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

165. In answer to the allegations in paragraph 165 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

166. In answer to the allegations in paragraph 166 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

167. In answer to the allegations in paragraph 167 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

168. In answer to the allegations in paragraph 168 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

169. In answer to the allegations in paragraph 169 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

170. In answer to the allegations in paragraph 170 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

171. In answer to the allegations in paragraph 171 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

172. In answer to the allegations in paragraph 172 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

173. In answer to the allegations in paragraph 173 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

174. In answer to the allegations in paragraph 174 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

175. In answer to the allegations in paragraph 175 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

176. In answer to the allegations in paragraph 176 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

177. In answer to the allegations in paragraph 177 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

178. In answer to the allegations in paragraph 178 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

179. In answer to the allegations in paragraph 179 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of

defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

180. In answer to the allegations in paragraph 180 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

181. In answer to the allegations in paragraph 181 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

182. In answer to the allegations in paragraph 182 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

183. In answer to the allegations in paragraph 183 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

184. In answer to the allegations in paragraph 184 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV

admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

185. In answer to the allegations in paragraph 185 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

186. In answer to the allegations in paragraph 186 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

187. In answer to the allegations in paragraph 187 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

188. In answer to the allegations in paragraph 188 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

189. In answer to the allegations in paragraph 189 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

190. In answer to the allegations in paragraph 190 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

191. In answer to the allegations in paragraph 191 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

192. In answer to the allegations in paragraph 192 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

193. In answer to the allegations in paragraph 193 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

194. In answer to the allegations in paragraph 194 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

195. In answer to the allegations in paragraph 195 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

196. In answer to the allegations in paragraph 196 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

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197. In answer to the allegations in paragraph 197 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

198. In answer to the allegations in paragraph 198 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

199. In answer to the allegations in paragraph 199 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV

admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

200. In answer to the allegations in paragraph 200 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

201. In answer to the allegations in paragraph 201 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

202. In answer to the allegations in paragraph 202 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

203. In answer to the allegations in paragraph 203 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

204. In answer to the allegations in paragraph 204 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

205. In answer to the allegations in paragraph 205 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

206. In answer to the allegations in paragraph 206 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

207. In answer to the allegations in paragraph 207 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

208. In answer to the allegations in paragraph 208 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

209. In answer to the allegations in paragraph 209 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

210. In answer to the allegations in paragraph 210 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

211. In answer to the allegations in paragraph 211 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

212. In answer to the allegations in paragraph 212 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

213. In answer to the allegations in paragraph 213 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

214. In answer to the allegations in paragraph 214 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

215. In answer to the allegations in paragraph 215 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV

admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

216. In answer to the allegations in paragraph 216 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

217. In answer to the allegations in paragraph 217 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

218. In answer to the allegations in paragraph 218 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

219. In answer to the allegations in paragraph 219 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of

defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

220. In answer to the allegations in paragraph 220 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

221. In answer to the allegations in paragraph 221 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

222. In answer to the allegations in paragraph 222 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

223. In answer to the allegations in paragraph 123 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

224. In answer to the allegations in paragraph 224 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV

admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

225. In answer to the allegations in paragraph 225 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

226. In answer to the allegations in paragraph 226 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

227. In answer to the allegations in paragraph 227, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226 of the Complaint herein as if set forth in full.

228. In answer to the allegations in paragraph 228 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

229. In answer to the allegations in paragraph 229 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV

admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

230. In answer to the allegations in paragraph 230 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

231. In answer to the allegations in paragraph 231 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

232. In answer to the allegations in paragraph 232 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

233. In answer to the allegations in paragraph 233 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of

defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

234. In answer to the allegations in paragraph 234 of the Complaint, DJAFAROV denies that he had any control or management over the Provider Defendants. DJAFAROV admits that he was an employee without any management or billing responsibilities, of defendant UNIVERSAL REHAB PT, P.C. DJAFAROV is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in the paragraph.

235. In answer to the allegations in paragraph 235, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226 and 228-234 of the Complaint herein as if set forth in full.

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236. In answer to the allegations in paragraph 236 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

237. In answer to the allegations in paragraph 237 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

238. In answer to the allegations in paragraph 238 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

239. In answer to the allegations in paragraph 239 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

240. In answer to the allegations in paragraph 240 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

241. In answer to the allegations in paragraph 241 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

242. In answer to the allegations in paragraph 242, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234 and 236-241 of the Complaint herein as if set forth in full.

243. In answer to the allegations in paragraph 243 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

244. In answer to the allegations in paragraph 244 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

245. In answer to the allegations in paragraph 245 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

246. In answer to the allegations in paragraph 246 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

247. In answer to the allegations in paragraph 247 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

248. In answer to the allegations in paragraph 248 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

249. In answer to the allegations in paragraph 249, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241 and 243-248 of the Complaint herein as if set forth in full.

250. In answer to the allegations in paragraph 250 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

251. In answer to the allegations in paragraph 251 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

252. In answer to the allegations in paragraph 252 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

253. In answer to the allegations in paragraph 253 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

254. In answer to the allegations in paragraph 254 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

255. In answer to the allegations in paragraph 255 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

256. In answer to the allegations in paragraph 256, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248 and 250-255 of the Complaint herein as if set forth in full.

257. In answer to the allegations in paragraph 257 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

258. In answer to the allegations in paragraph 258 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

259. In answer to the allegations in paragraph 259 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

260. In answer to the allegations in paragraph 260 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

261. In answer to the allegations in paragraph 261 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

262. In answer to the allegations in paragraph 262, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255 and 257-261 of the Complaint herein as if set forth in full.

263. In answer to the allegations in paragraph 263 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

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264. In answer to the allegations in paragraph 264 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

265. In answer to the allegations in paragraph 265 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

266. In answer to the allegations in paragraph 266 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

267. In answer to the allegations in paragraph 267 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

268. In answer to the allegations in paragraph 268 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

269. In answer to the allegations in paragraph 269, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261 and 263-268 of the Complaint herein as if set forth in full.

270. In answer to the allegations in paragraph 270 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

271. In answer to the allegations in paragraph 271 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

272. In answer to the allegations in paragraph 272 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

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273. In answer to the allegations in paragraph 273 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

274. In answer to the allegations in paragraph 274 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

275. In answer to the allegations in paragraph 275 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

276. In answer to the allegations in paragraph 276, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268 and 270-275 of the Complaint herein as if set forth in full.

277. In answer to the allegations in paragraph 277 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

278. In answer to the allegations in paragraph 278 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

279. In answer to the allegations in paragraph 279 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

280. In answer to the allegations in paragraph 280 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

281. In answer to the allegations in paragraph 281 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

282. In answer to the allegations in paragraph 282 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

283. In answer to the allegations in paragraph 283, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275 and 277-282 of the Complaint herein as if set forth in full.

284. In answer to the allegations in paragraph 284 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

285. In answer to the allegations in paragraph 285 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

286. In answer to the allegations in paragraph 286 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

287. In answer to the allegations in paragraph 287 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

288. In answer to the allegations in paragraph 288 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

289. In answer to the allegations in paragraph 289, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282 and 284-288 of the Complaint herein as if set forth in full.

290. In answer to the allegations in paragraph 290 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

291. In answer to the allegations in paragraph 291 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

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292. In answer to the allegations in paragraph 292 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

293. In answer to the allegations in paragraph 293 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

294. In answer to the allegations in paragraph 294 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

295. In answer to the allegations in paragraph 295 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

296. In answer to the allegations in paragraph 296, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288 and 290-296 of the Complaint herein as if set forth in full.

297. In answer to the allegations in paragraph 297 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

298. In answer to the allegations in paragraph 298 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

299. In answer to the allegations in paragraph 299 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

300. In answer to the allegations in paragraph 300 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

301. In answer to the allegations in paragraph 301 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

302. In answer to the allegations in paragraph 302 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

303. In answer to the allegations in paragraph 303, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-296 and 297-302 of the Complaint herein as if set forth in full.

304. In answer to the allegations in paragraph 304 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

305. In answer to the allegations in paragraph 305 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

306. In answer to the allegations in paragraph 306 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

307. In answer to the allegations in paragraph 307 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

308. In answer to the allegations in paragraph 308 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

309. In answer to the allegations in paragraph 309 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

310. In answer to the allegations in paragraph 310, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302 and 304-309 of the Complaint herein as if set forth in full.

311. In answer to the allegations in paragraph 311 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

312. In answer to the allegations in paragraph 312 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

313. In answer to the allegations in paragraph 313 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

314. In answer to the allegations in paragraph 314 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

315. In answer to the allegations in paragraph 315 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

316. In answer to the allegations in paragraph 316, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309 and 311-315 of the Complaint herein as if set forth in full.

317. In answer to the allegations in paragraph 317 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

318. In answer to the allegations in paragraph 318 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases. DJAFAROV denies each and every remaining allegation contained in the paragraph.

319. In answer to the allegations in paragraph 319 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

320. In answer to the allegations in paragraph 320 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph, and on that basis denies the allegations in such paragraph.

321. In answer to the allegations in paragraph 321 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the

amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

322. In answer to the allegations in paragraph 322 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

323. In answer to the allegations in paragraph 323, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315 and 317-322 of the Complaint herein as if set forth in full.

324. In answer to the allegations in paragraph 324 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

325. In answer to the allegations in paragraph 325, DJAFAROV admits to having been employed by UNIVERSAL REHAB.

326. In answer to the allegations in paragraph 326 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

327. In answer to the allegations in paragraph 327 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

328. In answer to the allegations in paragraph 328 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

329. In answer to the allegations in paragraph 329 of the Complaint, DJAFAROV admits to being indicted and charged with Conspiracy to Commit Health Care Fraud and Mail Fraud on 10 individual UNIVERSAL REHAB'S cases and has been making restitution in the amount of \$64,018.38 to GEICO. DJAFAROV denies each and every remaining allegation contained in the paragraph.

330. In answer to the allegations in paragraph 330, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322 and 324-329 of the Complaint herein as if set forth in full.

331. In answer to the allegations in paragraph 331 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

332. In answer to the allegations in paragraph 332 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

333. In answer to the allegations in paragraph 333 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

334. In answer to the allegations in paragraph 334 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

335. In answer to the allegations in paragraph 335 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

336. In answer to the allegations in paragraph 336 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

337. In answer to the allegations in paragraph 337, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329 and 331-336 of the Complaint herein as if set forth in full.

338. In answer to the allegations in paragraph 338 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

339. In answer to the allegations in paragraph 339 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

340. In answer to the allegations in paragraph 340 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

341. In answer to the allegations in paragraph 341 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

342. In answer to the allegations in paragraph 342 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

343. In answer to the allegations in paragraph 343, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336 and 338-342 of the Complaint herein as if set forth in full.

344. In answer to the allegations in paragraph 344 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

345. In answer to the allegations in paragraph 345 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

346. In answer to the allegations in paragraph 346 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

347. In answer to the allegations in paragraph 347 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

348. In answer to the allegations in paragraph 348 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

349. In answer to the allegations in paragraph 349 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

350. In answer to the allegations in paragraph 350, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261,

263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329,

331-336, 338-342 and 344-349 of the Complaint herein as if set forth in full.

351. In answer to the allegations in paragraph 351 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

352. In answer to the allegations in paragraph 352 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

353. In answer to the allegations in paragraph 353 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

354. In answer to the allegations in paragraph 354 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

355. In answer to the allegations in paragraph 355 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

356. In answer to the allegations in paragraph 356 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

357. In answer to the allegations in paragraph 357, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349 and 351-356 of the Complaint herein as if set forth in full.

358. In answer to the allegations in paragraph 358 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

359. In answer to the allegations in paragraph 359 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

360. In answer to the allegations in paragraph 360 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

361. In answer to the allegations in paragraph 361 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

362. In answer to the allegations in paragraph 362 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

363. In answer to the allegations in paragraph 363 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

364. In answer to the allegations in paragraph 364, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349, 351-356 and 358-363 of the Complaint herein as if set forth in full.

365. In answer to the allegations in paragraph 365 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

366. In answer to the allegations in paragraph 366 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

367. In answer to the allegations in paragraph 367 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

368. In answer to the allegations in paragraph 368 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

369. In answer to the allegations in paragraph 369 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

370. In answer to the allegations in paragraph 370, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349, 351-356, 358-363 and 365-369 of the Complaint herein as if set forth in full.

371. In answer to the allegations in paragraph 371 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

372. In answer to the allegations in paragraph 372 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

373. In answer to the allegations in paragraph 373 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

374. In answer to the allegations in paragraph 374 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

375. In answer to the allegations in paragraph 375 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

376. In answer to the allegations in paragraph 376 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

377. In answer to the allegations in paragraph 377, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261,

263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349, 351-356, 358-363, 365-369 and 371-376 of the Complaint herein as if set forth in full.

378. In answer to the allegations in paragraph 378 of the Complaint, DJAFAROV is without sufficient knowledge to form a belief as to the truth of the allegations contained in the paragraph.

379. In answer to the allegations in paragraph 379 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

380. In answer to the allegations in paragraph 380 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

381. In answer to the allegations in paragraph 381 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

382. In answer to the allegations in paragraph 382 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

383. In answer to the allegations in paragraph 383 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

384. In answer to the allegations in paragraph 384, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349, 351-356, 358-363, 365-369, 371-376 and 378-383 of the Complaint herein as if set forth in full.

385. In answer to the allegations in paragraph 385 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

386. In answer to the allegations in paragraph 386 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

387. In answer to the allegations in paragraph 387 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

388. In answer to the allegations in paragraph 388 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

389. In answer to the allegations in paragraph 389 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

390. In answer to the allegations in paragraph 390 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

391. In answer to the allegations in paragraph 391, DJAFAROV hereby incorporates by reference his responses to paragraphs 1-226, 228-234, 236-241, 243-248, 250-255, 257-261, 263-268, 270-275, 277-282, 284-288, 290-295, 297-302, 304-309, 311-315, 317-322, 324-329, 331-336, 338-342, 344-349, 351-356, 358-363, 365-369, 371-376, 378-383 and 385-390 of the Complaint herein as if set forth in full.

392. In answer to the allegations in paragraph 392 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

393. In answer to the allegations in paragraph 393 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

394. In answer to the allegations in paragraph 394 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

395. In answer to the allegations in paragraph 395 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

396. In answer to the allegations in paragraph 396 of the Complaint, DJAFAROV denies each and every allegation contained in the paragraph.

397. Any and all allegations not specifically admitted above are denied.

**II.  
AFFIRMATIVE DEFENSES**

398. By way of affirmative defense, DJAFAROV pleads accord and satisfaction.

399. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that any claims for recovery sought by Plaintiffs are barred by laches.

400. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that any claims for recovery sought by Plaintiffs are barred by the Statute of Limitations.

401. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads res judicata.

402. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads failure to state a claim.

403. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads failure of consideration.

404. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads estoppel.

405. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads release.

406. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that claims asserted by Plaintiffs are barred, in whole or in part, because the conduct of third parties was the sole proximate cause, superseding and/or intervening cause of the damages, if any, complained of by the Plaintiffs.

407. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that claims asserted by Plaintiffs are barred, in whole or in part, because the conduct of third parties solely caused and/or contributed to the damages, if any, complained of by the Plaintiffs.

---

**PRAYER**

WHEREFORE, DJAFAROV prays for judgment dismissing the Complaint and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ David A. Feinerman  
David A. Feinerman (DF 3320)  
NY Reg No. 2042620  
2765 Coney Island Avenue, 2<sup>nd</sup> floor  
Brooklyn, New York 11235  
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Attorney for Defendant  
RAFAEL DJAFAROV

**CERTIFICATE OF SERVICE**

I, hereby certify that a true and correct copy of the foregoing document was filed with the Court's ECF system and served (1) via electronic transmission by the Court on those parties authorized to participate and access the Electronic Filing System for the Eastern District of New York and (2) via e-mail or facsimile on the parties appearing below on this 16<sup>th</sup> day of July, 2015.

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405. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads release.

406. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that claims asserted by Plaintiffs are barred, in whole or in part, because the conduct of third parties was the sole proximate cause, superseding and/or intervening cause of the damages, if any, complained of by the Plaintiffs.

407. Additionally, and/or alternatively, and by way of affirmative defense, DJAFAROV pleads that claims asserted by Plaintiffs are barred, in whole or in part, because the conduct of third parties solely caused and/or contributed to the damages, if any, complained of by the Plaintiffs.

---

PRAYER

WHEREFORE, DJAFAROV prays for judgment dismissing the Complaint and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

  
\_\_\_\_\_  
David A. Feinerman (DF 3320)  
NY Reg No. 2042620  
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Brooklyn, New York 11235  
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Attorney for Defendant  
RAFAEL DJAFAROV

**CERTIFICATE OF SERVICE**

I, hereby certify that a true and correct copy of the foregoing document was filed with the Court's ECF system and served (1) via electronic transmission by the Court on those parties authorized to participate and access the Electronic Filing System for the Eastern District of New York and (2) via e-mail or facsimile on the parties appearing below on this 16<sup>th</sup> day of July, 2015.

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\_\_\_\_\_  
David A. Feinerman (DF3320)